



UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

CR No. 2:25-cr-00545-AB

Plaintiff,

I N F O R M A T I O N

v.

[18 U.S.C. § 371: Conspiracy to
Defraud the United States]

JEFFREY SPENCER and
CHRISTY EVEREKLIAN,

Defendants.

The United States Attorney charges:

[18 U.S.C. § 371]

A. INTRODUCTORY ALLEGATIONS

1. At times relevant to this Information:

a. The Federal Bureau of Investigation ("FBI") is the principal investigative arm of the Department of Justice. The FBI procures electronic equipment throughout the United States and elsewhere, including Los Angeles. The FBI solicits competitive bids from electronic equipment suppliers, as required under the Federal Acquisition Regulation.

b. Defendant JEFFREY SPENCER resided in Santa Clarita, California, and was the lead electronics technician for the Los

1 Angeles Field Office of the FBI. Defendant SPENCER completed several
2 trainings as an FBI procurement officer, including trainings related
3 to conflicts of interest, procurement requirements, and competitive
4 bid requirements.

5 c. Defendant CHRISTY EVEREKLIAN resided in Temecula,
6 California, and was defendant SPENCER's sister. Defendant EVEREKLIAN
7 was an owner of Maximum Media 37 LLC, a company in Carlsbad,
8 California; Platinum Digital Media Corp., a company in Temecula,
9 California; and San Diego Repair Center, a company with locations in
10 Carlsbad, California, and San Diego, California (collectively, "the
11 EVEREKLIAN companies"). The EVEREKLIAN companies sold electronic
12 equipment.

13 d. Defendant EVEREKLIAN was the signatory for Maximum
14 Media 37 LLC and Platinum Digital Media Corp. in the United States
15 General Services Administration's System for Award Management
16 ("SAM"), which requires vendors to annually register and provide
17 information about their procurement and financial transactions to
18 federal agencies.

19 B. CONSPIRACY TO DEFRAUD THE UNITED STATES

20 2. Beginning no later than in or about August 2015, and
21 continuing through at least August 2020, in Los Angeles and Riverside
22 Counties, within the Central District of California, and elsewhere,
23 defendants SPENCER and EVEREKLIAN, utilizing the EVEREKLIAN
24 companies, knowingly and willfully conspired with one another, and
25 with others known and unknown to the United States Attorney, to
26 defraud the United States and agencies thereof, namely, the FBI, by
27 impeding, impairing, obstructing, and defeating the lawful government

1 functions of the FBI with respect to solicitation of competitive bids
2 for electronic equipment by deceitful and dishonest means.

3 C. MANNER AND MEANS OF THE CONSPIRACY

4 3. The object of the conspiracy was carried out, and was to be
5 carried out, in substance, as follows:

6 a. Defendant SPENCER would solicit bids for electronic
7 equipment on behalf of the FBI from the EVEREKLIAN companies, despite
8 knowing that his sister, defendant EVEREKLIAN, had a financial
9 interest in those companies.

10 b. Defendant SPENCER never obtained a written conflict-
11 of-interest waiver relating to his solicitation of bids from
12 companies owned or partially owned by defendant EVEREKLIAN.

13 c. Defendants SPENCER and EVEREKLIAN would create and
14 cause to be created bids for electronic equipment from the EVEREKLIAN
15 companies to submit to the FBI.

16 d. Defendants SPENCER and EVEREKLIAN would then submit or
17 caused to be submitted those bids to the FBI in order to obtain
18 electronic equipment contracts offered by the FBI in Los Angeles
19 County in the Central District of California, and elsewhere.

20 e. Defendants SPENCER and EVEREKLIAN would submit or
21 caused to be submitted bids as allegedly independent and competitive
22 bids when, in fact, defendants SPENCER and EVEREKLIAN had already
23 designated which company would win the selected electronic equipment
24 contract from the FBI.

25 D. OVERT ACTS

26 4. On or about the following dates, in furtherance of the
27 conspiracy and to accomplish its object, defendants SPENCER and
28 EVEREKLIAN, and others known and unknown to the United States

1 Attorney, committed the following overt acts, among others, in the
2 Central District of California and elsewhere:

3 Overt Act No. 1: On August 25, 2020, in response to a request
4 for a bid from defendant SPENCER for electronic equipment, defendant
5 EVEREKLIAN emailed a bid from Maximum Media 37 LLC to the FBI for
6 approximately \$39,999.99. In the emailed bid, defendant EVEREKLIAN
7 wrote that the bid was submitted by a relative, M.E., when, in fact,
8 defendant EVEREKLIAN knew that the bid was submitted by defendant
9 EVEREKLIAN.

10 Overt Act No. 2: On August 26, 2020, in response to the same
11 request for a bid from defendant SPENCER, defendant EVEREKLIAN
12 emailed a bid from Platinum Digital Media Corp. to the FBI for
13 \$42,238.74.

14 Overt Act No. 3: On August 26, 2020, in response to the same
15 request for a bid from defendant SPENCER, defendant EVEREKLIAN
16 emailed a bid from San Diego Repair Center to the FBI for
17 \$43,702.32.

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